

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<b>IN RE: VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER</b>

**SECOND AMENDED NOTICE TO TAKE VIDEOTAPED ORAL DEPOSITION**

TO: **Seth A. Goldberg, Esq,**  
**DUANE MORRIS LLP**  
**30 South 17th Street**  
**Philadelphia, Pennsylvania 19103**  
*Attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Huahai U.S., Inc.,  
Prinston Pharmaceutical Inc., and Solco Healthcare US, LLC (hereinafter "Defendants").*

Please take notice that pursuant to Federal Rule of Civil Procedure 30, and other applicable Rules, including the Local Civil Rules, and the applicable Orders of the Court, Plaintiffs, by and through their counsel, will take the videotaped deposition of Jie (Jay) Wang, Vice President of Business Development at Zhejiang Huahai Pharmaceutical Co., Ltd., on May 18 and 19, 2021, at 7:00 a.m. Hong Kong time (May 17 and 18, 2021, at 7:00 p.m. eastern time), and continuing until completion, at Duane Morris LLP, 30 South 17th St, Philadelphia, Pennsylvania 19103, via zoom, in accordance with the Fact Witness Deposition Protocol, Case Management Order #20, filed November 17, 2020 (Document 632). The deposition shall first address the Federal Rule of Civil Procedure 30(b)(6) topics listed on Exhibit A attached hereto, followed by deposition of the witness in his individual capacity. The witness shall produce the documents requested at Exhibit B, attached hereto, at least five days in advance of the deposition.

Pursuant to the meet and confer between the parties, a translator will not be provided.

**TAKING ATTORNEYS FOR PLAINTIFFS:**

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The videotaped deposition will be taken before a person authorized by law to administer oaths, pursuant to Rule 28 of the Federal Rules of Civil Procedure.

May 7, 2021

**PLAINTIFFS' CO-LEAD COUNSEL**

By: /s/Adam M. Slater  
ADAM M. SLATER  
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**EXHIBIT A**

**30(B)(6) TOPICS**

***On behalf of Zhejiang Huahai Pharmaceutical Co., Ltd:***

*ZHP's Communications with API and Finished Dose Customers and Downstream Customers*

42. ZHP's oral and written communications with Novartis with regard to the content/purity/contamination of ZHP's valsartan API.

43. ZHP's oral and written communications with ZHP's valsartan API Customers or other downstream entities (i.e. wholesalers, retailers, consumers, TPP's) regarding quality, purity, or contamination issues related to the ZHP valsartan API.

47. All credits, indemnification, refunds, and/or penalties paid or provided by or to ZHP in connection with the nitrosamine contamination of ZHP's valsartan API and ZHP's valsartan finished dose.

*Product Tracing*

50. Tracing of batches and lots of ZHP's valsartan API sold downstream and ultimately intended for use by consumers in the United States.

52. The pricing of ZHP's valsartan API that as ultimately sold in the United States.

54. The gross and net profits to ZHP from the sale of ZHP's valsartan API in the United States.

56. The quantity/units of ZHP's valsartan API sold in the United States.

58. The ZHP valsartan API sales and pricing data produced by you in this litigation (sample documents to be provided at least 30 days in advance of deposition during the meet and confer process).

**EXHIBIT B**

**DOCUMENT REQUESTS**

1. The most recent resume/Curriculum Vitae and LinkedIn profile for Jie (Jay) Wang.
2. The complete production of Jie (Jay) Wang's relevant custodial documents, including those maintained on personal computers or electronic devices, to the extent not produced prior.

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 7, 2021, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

PLAINTIFFS' CO-LEAD COUNSEL

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